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ELECTRONICALLY FILED
DOC# 10/6/15
DATE FILED: 10/6/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE ELETROBRAS SECURITIES
LITIGATION

Case No.: 1:15-cv-5754-JGK

**STIPULATION AND AGREED ORDER SETTING SCHEDULE FOR
LEAD PLAINTIFFS' FILING OF CONSOLIDATED CLASS ACTION COMPLAINT
AND DEFENDANTS' RESPONSE THERETO**

WHEREAS, on October 2, 2015 the Court entered an order consolidating the above-captioned actions, appointing Dominique Lavoie and City of Providence, Rhode Island as Lead Plaintiffs, and approving their selection of Kahn Swick & Foti LLP and Kaplan Fox & Kilsheimer LLP as Lead Counsel;

WHEREAS, the parties have met and conferred and agreed on a schedule for the filing of Lead Plaintiffs' forthcoming Consolidated Complaint and Defendants' response thereto;

NOW, THEREFORE, IT IS HEREBY ORDERED AND AGREED BY AND BETWEEN THE UNDERSIGNED, SUBJECT TO THE COURT'S APPROVAL, AS FOLLOWS:

1. Lead Plaintiff shall file a Consolidated Class Action Complaint ("Consolidated Complaint") on or before December 8, 2015;

2. Defendant shall answer, move and/or respond to the Consolidated Complaint on or before January 27, 2016;

3. If Defendants file a motion to dismiss, Lead Plaintiffs shall elect either to stand on the Consolidated Complaint or to file a Consolidated Amended Complaint;

4. If Lead Plaintiffs elect to stand on the Consolidated Complaint, Lead Plaintiffs shall file their opposition to any motion to dismiss on or before February 26, 2016;

5. Defendants shall file their reply to any opposition to motion dismiss on or before March 15, 2016;

6. If Lead Plaintiffs elect to file a Consolidated Amended Complaint, they shall do so on or before February 26, 2016.

7. Defendants shall answer, move and/or respond to the Consolidated Amended Complaint on or before April 15, 2016;

8. Lead Plaintiff shall file its opposition to any motion to dismiss the Consolidated Amended Complaint on or before May 17, 2016; and

9. Defendants shall file their reply to any opposition to motion dismiss the Consolidated Amended Complaint on or before June 3, 2016.

SO STIPULATED.

Dated: October 5, 2015

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IT IS SO ORDERED.

DATED: 10/6/15

John G. Koeltl
THE HONORABLE JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE